

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

AL MALIK ALSHAHHI, et al.

Defendants.

Case No.: 1:21-cr-00371-BMC-TAM

ORAL ARGUMENT REQUESTED

**NON-PARTY ALISON MARCKSTADT’S MOTION TO QUASH RULE 17(C)
SUBPOENA**

Now into Court, through undersigned counsel, comes Non-party Alison Marckstadt (“Ms. Marckstadt”). Ms. Marckstadt files this Motion to Quash a trial subpoena issued by the government on August 29, 2022 (the “August 2022 Subpoena”) and formally served on August 30, 2022, pursuant to Federal Rule of Criminal Procedure 17 (“Rule 17”). The August 2022 Subpoena demands production of documents responsive to twelve overbroad categories and makes no effort to comply with the requirements of the standard set forth in *United States v. Nixon*, 418 U.S. 683 (1974). Moreover, the August 2022 Subpoena seeks production of privileged and work product information and of documents that have already been produced to the government.

Dated: September 1, 2022

Respectfully submitted,

CHIESA SHAHINIAN & GANTOMASI

/s/ Emil Bove

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